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ILLINOIS POWER COMPANY

500 SOUTH 27TH STREET, DECATUR, ILLINOIS 62525-1805

November 30, 1987

Mr. Harry Chappel
Compliance Monitoring Section
Division of Land Pollution Control
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

1671200015 Monroe/SPRINGERID CONFURNCE FILE

Dear Mr. Chappel:

The purpose of this letter is to describe two incidents involving the manifesting of waste oil from Illinois Power Company (IPC) facilities to Pierce Waste Oil (MORECO) in Springfield, Illinois: (1) manifesting contaminated waste oil on an expired permit from two Decatur facilities and (2) MORECO's use of generic authorization numbers on manifests.

Manifesting Contaminated Oil from Decatur Facilities on Expired Permits

Waste oil was picked up by Pierce Waste Oil from the Decatur Service Area facility at 2460 North Jasper Street (Illinois Generator I.D. #1150150021) and the Decatur Headquarters facility at 500 South 27th Street (Illinois Generator I.D. #1150150023) on June 30, 1987. The authorization number used on manifest document number 1644100 (Attachment 1) for the 2460 North Jasper Street facility was 992997. The authorization number used for the 500 South 27th Street facility on manifest document number 1644101 (Attachment 2) was 992996. Both authorizations had expired on June 3, 1987. According to Mike Bedolli, the MORECO representative at the Springfield facility, the waste oil was shipped from Springfield (Illinois Facility I.D. #167200015) to the facility in McCook (Illinois Facility I.D. #031174002).

The shipment of waste oil from these two Decatur facilities on expired permits was complicated by another factor. Sample results received on May 28, 1987 from the Jasper Street waste oil tank and on June 30, 1987 from the 27th Street waste oil tank (Attachment 3) indicated that the total chlorine was greater than .1%. The analytical results had been obtained to renew the supplemental waste stream permits.

IPC's Environmental Affairs Department (EAD) immediately notified the Headquarters Service Area Operations staff of the chlorine result and advised them not to allow shipment of the waste oil to Pierce Waste Oil until additional testing was done to determine the source of the chlorine. Further analytical results were obtained on July 7, 1987 (Attachment 4). These results indicated the presence of contaminants, some of which may be listed. When EAD informed Headquarters Service Area Operations staff of the results, it was found that due to a communication problem between Headquarters staff and the service area, the waste oil had already been shipped out on June 30, 1987.

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Since obtaining the analytical data, IPC has determined the source of the contaminants. Of the contaminants found at detectable levels in the samples, only two, 1,1,1 trichloroethane (detection limit 2.0 ppm) and tetrachlorethene (perchloroethylene) (detection limit 2.0 ppm) are consistent with solvents known to be used by IPC. The solvents were two brake cleaning products. The Material Safety Data Sheets are attached. The source of the other halogenated constituents could not be determined, but the contamination does not appear to be from solvent use. Given the varying nature of waste oil, IPC cannot further evaluate the source of contamination in this waste oil shipment.

To prevent a recurrence of these matters of concern, IP has taken the following steps:

- A. We are reviewing nonchlorinated substitute products (Chemical Industries Formula 0-88) for the currently used cleaner/degreaser.
- B. IP continues to segregate regulated used products from waste oils.
- C. We are pursuing renewal of supplemental waste stream authorizations.
- D. Procedures are being written for service area personnel involved in these activities to ensure their familiarity with proper waste management practices.
- E. The frequency of waste oil testing will be increased from annual to semi-annual.

MORECO's Use of Generic Authorization Numbers

In a separate matter, IP is concerned about and is currently investigating the appropriateness of MORECO's use of generic permits for various IP materials. The facts are as follows:

- o IPC was provided authorization number 000044 by Pierce Waste Oil, Springfield, to cover a shipment of waste crankcase oil from Clinton Power Station. This shipment had been made on June 5, 1987 on manifest #1672551 (Attachment 5).
- o IPC was not aware that authorization number 000044 is not designated for waste crankcase oil until our September 8, 1987 meeting with IEPA. IPC was also not aware, at the time of shipment, that the use of this generic authorization number requires shipment directly to MORECO's McCook facility.
- o IPC requested a copy of the manifest transporting the waste crankcase oil from Pierce (Springfield) to McCook.
- o Per this request, IPC received Illinois manifest form #1715084 (Attachment 6). The authorization number on this manifest appears to be 000049 and the date of shipment from the Springfield facility to the McCook facility is shown as June 23, 1987.

IPC has sent letters dated September 25 and November 2 to MORECO regarding similar manifesting irregularities from other IPC facilities to MORECO's facilities. A copy of both letters was provided to the IEPA. IPC is surprised by MORECO's waste management practices, and we are committed to cooperating with the IEPA in any future investigation.

Sincerely,

ILLINOIS POWER COMPANY

S. Paige Hall

& Paige Hall

Supervisor - Environmental Assessment

SPH7:dmf

cc: Larry Eastep - IEPA Russell Selman - Schiff, Hardin & Waite

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. A aqualab inc.

ANALYTICAL REPORT

05-28-87

Sample No.: 46734

Mr. Bob Thomas
ILLINOIS POWER COMPANY
500 South 27th Street
Decatur IL 62525

Sample Description:

DC-87-13 Decatur gasper St.

Waste Crankcase Oil

Date Taken: Unknown

Date Received: 05-11-87 0930

### BTU	BS & W	<1.	%
Cyanide, Total <0.5		17,000.	/1b
Sulfide 172. ug/g Arsenic <0.5	Chlorine, Total (%)	8.09	%
Arsenic <0.5	Cyanide, Total	<0.5	ug/g
Barium 7.76 ug/g Cadmium 2.54 ug/g Chromium, Total 27.5 ug/g Lead 121. ug/g Mercury <0.01	Sulfide	172.	ug/g
Cadmium 2.54 ug/g Chromium, Total 27.5 ug/g Lead 121. ug/g Mercury <0.01	Arsenic	<0.5	ug/g
Chromium, Total 27.5 ug/g Lead 121. ug/g Mercury <0.01	Barium	7.76	ug/g
Lead 121. ug/g Mercury <0.01	Cadmium	2.54	ug/g
Mercury <0.01 ug/g Selenium <0.5 ug/g Silver <0.05 ug/g Corrosivity (pH) 6.00 units Ignitability (Flash Point) No Flash @ 212 Degree F	Chromium, Total	27.5	ug/g
Selenium <0.5 ug/g Silver <0.05 ug/g Corrosivity (pH) 6.00 units Ignitability (Flash Point) No Flash @ 212 Degree F	Lead	121.	ug/g
Silver <0.05 ug/g Corrosivity (pH) 6.00 units Ignitability (Flash Point) No Flash @ 212 Degree F	Mercury	<0.01	ug/g
Corrosivity (pH) 6.00 units Ignitability (Flash Point) No Flash @ 212 Degree F	Selenium	<0.5	
Ignitability (Flash Point) No Flash @ 212 Degree F	Silver	<0.05	ug/g
- 6	1 - 11 - 1		
Reactive Sulfide 0.48 ug/g			= = = = = = = = = = = = = = = = = = =
	Reactive Sulfide	0.48	ug/g

This sample was found to be nonrepresentative since it was taken from an interim container rather than the waste oil tank. The contents of this interim container were eventually poured into the waste oil tank.

S. Paige Hall

hillian H. Hotbashed

William H. Mottashed, Manager Bartlett Division

Austin Division

Bartlett Division

Rosner/Runyon Division

Rockford Division

Corporate Office

2621-130 Ridgepoint Dr. Austin TX 78754 512-928-8905 850 West Bartlett Rd. Bartlett IL 60103 312-289-3100 222 South Morgan St. Chicago IL 60607 312-666-4469 3548 35th St. Rockford IL 61109 815-874-2171 850 West Bartlett Rd. Bartlett IL 60103 312-289-3100

\Delta aqualab inc.

ANALYTICAL REPORT

Mr. Bob Thomas ILLINOIS POWER COMPANY 500 South 27th Street Decatur IL 62525

Sample No.:

Sample Description:

DC-87-13

Date Taken: Unknown

Date Received:

03-12-87

EP Tox - Cadmium

EP Tox - Chromium

EP Tox - Lead

0.063 <0.001

0.25

mg/L

mg/L

mg/L

Mottashed, Manager Bartlett Division

Austin Division

Bartlett Division

Rosner/Runyon Division

3548 35th St.

Corporate Office

2621-130 Ridgepoint Dr. Austin TX 78754 512-928-8905

850 West Bartlett Rd. Bartlett IL 60103 312-289-3100

222 South Morgan St. Chicago IL 60607 312-666-4469

Rockford IL 61109 815-874-2171

Rockford Division

aqualab inc.

ANALYTICAL REPORT

Mr. Bob Thomas ILLINOIS POWER COMPANY 500 South 27th Street Decatur IL

06-30-87

Sample No.:

Sample Description:

DES-87-14 Decatur-gasper St

Date Taken: 06-09-87 Date Received: 06-16-87 1000

BS & W	5	` %
BTU	13,100.	/lb
Chlorine, Total (%)	0.7	%
Sulfide	1.5	ug/g
Arsenic	6.4	ug/g
Cadmium	3.54	ug/g
Chromium, Total	6.72	ug/g
Lead	4960.	ug/g
Corrosivity (pH)	7.00	units
Ignitability (Flash Point)	Flash at 110	F
EP Tox - Arsenic	0.002	mg/L
EP Tox - Cadmium	0.183	mg/L
EP Tox - Lead	107.	mg/L
P	CB's	
PCB-1016	<10.	ug/g
PCB-1221	<5.	ug/g
PCB-1232	<5.	ug/g
PCB-1242	<5.	ug/g
PCB-1248	< 5.	ug/g
PCB-1254	<10.	ug/g
PCB-1260	<10.	ug/g

Sample taken from waste oil tank

William H. Mottashed, Manager Bartlett Division

Austin Division	
The second secon	٠.
2621-130 Ridgepoint Dr.	
Austin TX 78754	
512-928-8905	

312-289-3100

312-666-4469

Rosner/Runyon Division

Rockford Division

Corporate Office

aqualab inc.

ANALYTICAL REPORT

Mr. Bob Thomas ILLINOIS POWER COMPANY 500 South 27th Street Decatur IL 62525

Sample No.:

48985

Sample Description:

DES-87-14

Old sample #48087

Date Taken: 06-09-87 Date Received: 06-16-87 1000

EP Tox - Chromium

0.022

mg/L

William H. Mottashed, Manager Bartlett Division

850 West Bartlett Rd. Bartlett IL 60103 312-289-3100

aqualab inc.

REPORT ANALYTICAL

Mr. Bob Thomas ILLINOIS POWER COMPANY 500 South 27th Street Decatur IL 62525

Sample No.:

Sample Description:

DES-87-15 Decatur- 27 th Street

Date Taken: 06-09-87 Date Received: 06-16-87 1000

BS & W	<1	.%
BTU	19,200	/lb
Chlorine, Total (%)	0.3	*
Sulfide	1.5	ug/g
Arsenic	<0.5	ug/g
Cadmium	0.35	ug/g
Chromium, Total	0.50	ug/g
Lead	9.5	ug/g
Corrosivity (pH)	7.00	units
Ignitability (Flash Point)	No Flash at 212	F
EP Tox - Lead	0.28	mg/L

Mottashed, Manager Bartlett Division

Corporate Office

Bartlett IL 60103

312-289-3100

850 West Bartlett Rd.



Mr. Bob Thomas
ILLINOIS POWER COMPANY
500 South 27th Street
Decatur IL 62525

07-07-87

Sample No.: 48020

Sample Description:

DC-87-13 Decatur-gasper St.

Date Taken: Unknown

Date Received: 03-12-87

VOLATILE COMPOUNDS

Acrolein	<100.	•	ug/g
Acrylonitrile	<100.	•	ug/g
Benzene	<10.		ug/g
Bromodichloromethane	<10.		ug/g
Bromoform	<10.		ug/g
Bromomethane	<100.		ug/g
Carbon tetrachloride	< 10.		ug/g
Chlorobenzene	<10.		ug/g
Chloroethane	<100.		ug/g
2-Chloroethylvinyl ether	<10.		ug/g
Chloroform	<10.	•	ug/g
Chloromethane	<100.		ug/g
Dibromochloromethane	<10.		ug/g
1,2-Dichlorobenzene	<10.		ug/g
1,3-Dichlorobenzene	<10.	,	ug/g
1,4-Dichlorobenzene	<10.		ug/g
1,1-Dichloroethane	<10.		ug/g
1,2-Dichloroethane	<10.		ug/g
1,1-Dichloroethene	783.		ug/g
cis-1,2-Dichloroethene	<10.		ug/g
trans-1,2-Dichloroethene	<10.		ug/g
1,2-Dichloropropane	<10.		ug/g
cis-1,3-Dichloropropene	<10.		ug/g
trans-1,3-Dichloropropene	<10.		ug/g.
Ethyl benzene	<10.		ug/g
Methylene chloride	<50.		ug/g
1,1,2,2-Tetrachloroethane	<10.		ug/g
•			

William H. Mottashed, Manager Bartlett Division

Austin Division Bartlett Division Rosner/Runyon Division **Rockford Division** Corporate Office 850 West Bartlett Rd. 2621-130 Ridgepoint Dr. 3548 35th St. 850 West Bartlett Rd. 222 South Morgan St. . Austin TX 78754 Bartlett IL 60103 Chicago IL 60607 Rockford IL 61109 Bartlett IL 60103 512-928-8905 312-666-4469 312-289-3100 312-289-3100 815-874-2171



Mr. Bob Thomas
ILLINOIS POWER COMPANY
500 South 27th Street
Decatur IL 62525

07-07-87

Sample No.: 48020

Sample Description: I

DC-87-13

Date Taken: Unknown Date Received: 03-12-87

Tetrachloroethene	896.	ug/g
Toluene	73.4	ug/g
1,1,1-Trichloroethane	1430.	ug/g
1,1,2-Trichlóroethane	<10.	ug/g
Trichloroethene	< 1.0 .	ug/g
Trichlorofluoromethane	<10.	ug/g
Vinyl chloride	<100.	ug/g
Xylenes, Total	108.	ug/g
Freon	<5.0	ug/g
	PCB's	
PCB-1016	<10.	ug/g
PCB-1221	<5.	ug/g
PCB-1232	<5.	ug/g
PCB-1242	<5.	ug/g
PCB-1248	<5.	ug/g
PCB-1254	<10.	ug/g
PCB-1260	<10.	ug/g

William H. Mottashed, Manager Bartlett Division



Mr. Bob Thomas
ILLINOIS POWER COMPANY
500 South 27th Street
Decatur IL 62525

06-30-87

Sample No.: 48088

Sample Description:

DES-87-15

Decatur 27th Street

Date Taken: 06-09-87

Date Received: 06-16-87 1000

VOLATILE COMPOUNDS

Acrolein	<200.	ug/g
Acrylonitrile	<200.	ug/g
Benzene	41.	ug/g
Bromodichloromethane	<20.	ug/g
Bromoform	<20.	ug/g
Bromomethane	<200.	ug/g
Carbon tetrachloride	<20.	ug/g
Chlorobenzene	<20.	ug/g
Chloroethane	<200.	ug/g
2-Chloroethylvinyl ether	<20.	ug/g
Chloroform	<20.	ug/g
Chloromethane	<200.	ug/g
Dibromochloromethane	<20.	ug/g
1,2-Dichlorobenzene	<20.	ug/g
1,3-Dichlorobenzene	<20.	ug/g
1,4-Dichlorobenzene	<20.	ug/g
1,1-Dichloroethane	<20.	ug/g
1,2-Dichloroethane	<20.	ug/g
1,1-Dichloroethene	45.	ug/g
cis-1,2-Dichloroethene	<20.	ug/g
trans-1,2-Dichloroethene	<20.	ug/g
1,2-Dichloropropane	<20.	ug/g
cis-1,3-Dichloropropene	<20.	ug/g
trans-1,3-Dichloropropene	<20.	ug/g
Ethyl benzene	106.	ug/g
Methylene chloride	<100.	ug/g
1,1,2,2-Tetrachloroethane	<20.	ug/g

William H. Mottashed, Manager Bartlett Division

Austin Division Corporate Office **Bartlett Division** Rosner/Runyon Division **Rockford Division** 2621-130 Ridgepoint Dr. 850 West Bartlett Rd. 222 South Morgan St. 3548 35th St. 850 West Bartlett Rd. Austin TX 78754 Bartlett IL 60103 Chicago IL 60607 Rockford IL 61109 Bartlett IL 60103 512-928-8905 312-289-3100 312-666-4469 815-874-2171 312-289-3100



Mr. Bob Thomas
ILLINOIS POWER COMPANY
500 South 27th Street
Decatur IL 62525

06-30-87

Sample No.: 48088

Sample Description: DES-87-15

Date Taken: 06-09-87

Date Received: 06-16-87 1000

Tetrachloroethene	<20.	ug/g-
Toluene	286.	.ug/g
1,1,1-Trichloroethane	316.	ug/g
1,1,2-Trichloroethane	<20.	ug/g
Trichloroethene	< 20.	ug/g
Trichlorofluoromethane	942.	ug/g
Vinyl chloride	<200.	ug/g
Xylenes, Total	722.	ug/g
Freon 7	166.	ug/g
•		_
	PCB's	•
PCB-1016	<10.	ug/g
PCB-1221	<5.	ug/g
PCB-1232	< 5 .	ug/g
PCB-1242	<5.	ug/g
PCB-1248	< 5.	ug/g
PCB-1254	<10.	ug/g
PCB-1260	<10.	ug/g

William H. Mottashed, Manager Bartlett Division

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